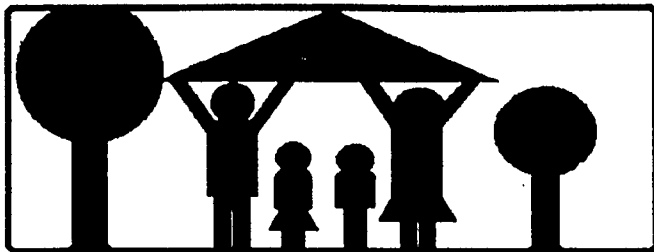


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civic center barrio housing corporation

March 31, 1999

Office of the Fiscal Assistant Secretary
U.S. Department of Treasury, Rm. 2112
1500 Pennsylvania Avenue, N.W.
Washington D.C. 20220

Dear Sir :

I am writing on behalf of Civic Center Barrio Housing Corp. to urge Treasury to prohibit check cashers and other "payment service provider" from providing recipients access to electronic federal benefits, as part of EFT'99. Check cashers prey upon low-income consumers and deny their customers the consumer protections provided at mainstream financial institutions.

CCBHC is a public benefit non-profit housing corporation who constructs affordable housing for low persons. Our residents cannot afford to pay for these services and decent safe & sanitary housing. Also, when the treasury began EFT'99 with the stated goal of bringing the unbanked into the financial mainstream. Allowing check cashers to be the access point for federal benefits recipients to receive their funds, however, does exactly the opposite. Check cashers force consumers to pay excessive fees for transactions that should be available to them at a reasonable cost. For instance, in California check cashers charge an annual percentage rate of almost 400% for a payday loan! With interest rates this high, recipients are prevented from having access to their benefits at a reasonable cost.

Check cashers also provide few consumer protections that they would receive if they banked at a federally insured financial institution. If federal benefits recipients have an account with such fringe bankers, check cashers may withhold federal funds as payment for past sums owed to the check casher.

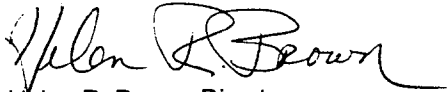
Civic Center Barrio Housing Corporation
1665 E. Fourth Street, Suite 210
Santa Ana, California 92701
(714) 835-0406 FAX (714) 835-7354

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By allowing check cashers to provide access to federal funds, Treasury will not only condone but also stimulate the abusive practices of check cashers. While the customer will go to the check casher to receive her federal benefits, she may also become a potential customer for a numerous other abusive transactions. The number of check cashers has doubled since 1990, and is steadily growing. This profitable industry makes no reinvestment back into the low-income communities in which they operate.

It is time Treasury made EFT'99 a program that truly protects consumers and ensures that low-income recipients are not relegated to a position outside the financial mainstream. Please prohibit arrangements wherein recipients of electronic federal payments gain access to benefits through non-depository payment service providers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Helen R. Brown".

Helen R. Brown, Director
Civic Center Barrio Housing Corp.

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